

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Scott W. Kelley, being first duly sworn, hereby depose and state:

1. I am a Postal Inspector with the United States Postal Inspection Service (USPIS), having been appointed to this position in June 2007. I am currently assigned to the Boston Division and I am responsible for the investigation of various crimes relating to the United States Mail. Prior to my appointment as a Postal Inspector, I was a Special Agent with the Naval Criminal Investigative Service (NCIS) for approximately one year and I was responsible for investigations in the interest of the United States Navy and Marine Corp. Prior to my NCIS employment, I was a Postal Inspector with USPIS between approximately September 2003 and June 2006. I have attended training at the Federal Law Enforcement Training Center (FLETC) in Glynco, GA and have completed Basic Inspector Training (BIT) in Potomac, MD. I have received training in the investigation of crimes involving the sexual exploitation of children by attending numerous seminars and courses. I have investigated child pornography cases and related sexual offenses for approximately eight years. As a federal agent, I am authorized to investigate violations of laws of

the United States and to execute warrants issued under the authority of the United States.

2. I have conducted numerous investigations relating to the possession, receipt, transportation, distribution, and production of child pornography and obscene visual representations of the sexual abuse of children over the Internet and the US Mail. I have received training in investigations relating to the sexual exploitation and physical sexual abuse of minors. I have reviewed thousands of images and videos of actual and suspected child pornography, child erotica, and obscene visual representations of the sexual abuse of children.

3. I make this affidavit in support of an application for a criminal complaint against Jason M. Wolf, ("Wolf") DOB xx/xx/1985, of Washington D.C., charging him with transportation of a minor in interstate commerce with intent to engage in criminal sexual activity, in violation of 18 U.S.C. §2423(a).

4. The statements contained in this affidavit are based upon my own investigation and information provided to me by other law enforcement agents involved in this investigation.

5. This affidavit is being submitted for the limited purpose of establishing probable cause to secure a criminal complaint and arrest warrant. In submitting this affidavit, I have not included each and every fact known to me concerning this investigation. Where conversations or statements are related herein, they are set forth in substance and in part.

#### INVESTIGATION

6. On August 17, 2015, the Massachusetts Bay Transportation Authority ("MBTA") Police received a request for assistance from a security guard at the South Station Bus Terminal in Boston, MA. The security guard reported observing suspicious activity between an adult male and a minor male including holding hands and touching each other under a blanket while inside the bus terminal.

7. Uniformed officers arrived on scene and separately questioned the two individuals they encountered at the bus terminal. One was identified as Wolf who provided a Pennsylvania driver's license as proof of identification. The other individual ("Minor A") identified himself by name, stated that he was 15 years old, and lived in Maryland.

8. Wolf stated he met Minor A through the Big Brother Program. Minor A stated that they met through a mobile dating application or app called Hornet.<sup>1</sup> Minor A also stated that he and Wolf had taken a bus together from Maryland a few days earlier and recently arrived in Boston. Minor A stated that Wolf had provided the bus tickets for him. Minor A stated that he and Wolf were leaving that day and taking a bus to Connecticut. Minor A also stated that he and Wolf engaged in oral and anal sexual intercourse over the last few days in various locations including Maryland, Washington, D.C., New York, and Boston, Massachusetts.

9. During questioning law enforcement observed Wolf take out an iPhone and start going through the pictures and videos on the device. The iPhone was taken from Wolf and he was placed under arrest and transported to the MBTA Police Headquarters. Wolf was charged with aggravated statutory rape, in violation of MGL Ch. 265 §23, and enticement of a child for sex, in violation of MGL Ch. 265 §26C. During Wolf's booking, law enforcement seized two

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<sup>1</sup> The following is taken from the website gthrnt.com which provides the mobile links to the Hornet application: "Hornet makes it fun and easy for gay, bi, and curious guys to meet each other. Find great dates and make new friends with this FREE gay app."

bus tickets,<sup>2</sup> the iPhone, a Motorola cell phone, a Toshiba external hard drive, a white USB thumb drive, and a black and blue "Urban Beats" digital music storage device.

During booking, Wolf stated that the Motorola phone was not his and that it belonged to Minor A.

10. Wolf was advised of his rights and agreed to an interview. During the interview Wolf stated that he met Minor A during the month of July 2015, on a dating app called Hornet and that he had communicated with Minor A via the Hornet app as well as another application called KIK.<sup>3</sup> Wolf went on to state that he met Minor A in person on or about July 10, 2015 in Maryland, he believed Minor A was 14 years old, and that their relationship became sexual. Wolf admitted to having oral and anal sex with Minor A in Maryland as well as engaging in oral sex with Minor A recently at a residence in Boston, Massachusetts.

11. Officers also learned that Minor A was the subject of a missing person warrant out of Prince George's County, Maryland. Minor A was taken into protective custody and transported to an area hospital for evaluation.

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<sup>2</sup> One of the bus tickets was in the name of Malik Brothers the other was in the name of Jordan Wolaski.

<sup>3</sup> Kik is a mobile texting/chatting application that advertises "Over 40% of American youth use Kik to chat, browse and share with their friends..."

VICTIM INTERVIEW

12. On August 19, 2015, a forensic interview of Minor A was conducted by a child forensic interviewer in Boston, Massachusetts.

13. Minor A stated that he lived in Maryland, and that he met Wolf online on or about July 9, 2015 after receiving a message from him on the dating application Hornet. He began conversing with Wolf online via iMessage<sup>4</sup> and Hornet and met him in person the following day, July 10, 2015, in Maryland. Minor A stated that he immediately began having a sexual relationship with Wolf. Minor A stated that he and Wolf had anal and oral sex in various locations in Washington, D.C., Maryland, New York, and in Boston, Massachusetts.

14. Minor A stated that Wolf had purchased bus tickets for him and they travelled from Maryland to Boston. Minor A stated that Wolf had purchased bus tickets under false names for them. Minor A stated that Wolf had a laptop computer, but had sold it while they were in New York to obtain bus tickets. Additionally Minor A stated that he was using one of Wolf's old phones while traveling with him, which he described as a black Motorola cell phone.

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<sup>4</sup> iMessage is Apple's mobile messaging application which "lets you send messages back and forth with anyone on iPad, iPhone, iPod touch, or a Mac... Send photos, videos, locations, and contacts, too."

CONCLUSION

15. Based on the foregoing, I believe there is probable cause to believe that Jason Wolf did knowingly and willingly transport an individual who has not attained the age of 18 years in interstate or foreign commerce, with intent that the individual engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, violation of 18 U.S.C. §2423(a).



SCOTT W. KELLEY  
United States Postal Inspector

Sworn and subscribed to before me this 16<sup>th</sup> day of  
September, 2015.



MARIANNE B. BOWLER  
U.S. Magistrate Judge

